

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
BEARINGPOINT, INC., <i>et al.</i>	:	Case No.: 09-10691 (REG)
	:	
Debtor.	:	(Jointly Administered)
	:	
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	:	
JOHN DeGROOTE SERVICES LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Adv. Pro. No.: 11-01483 (REG)
AMERICAN EXPRESS TRAVEL RELATED	:	
SERVICES COMPANY, INC.,	:	
	:	
Defendant.	:	
	:	
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**STIPULATED SCHEDULING ORDER**

Upon the scheduling conference held on May 19, 2011, and the agreement of John DeGroote Services, LLC, as Liquidating Trustee for the BearingPoint, Inc. Liquidating Trust, and American Express Travel Related Services Company, Inc. to the following stipulated schedule regarding the above-captioned adversary proceeding (the "Adversary Proceeding"):

**IT IS HEREBY ORDERED THAT:**

1. Factual discovery may commence immediately and will continue until November 1, 2011.
2. Initial expert reports, if any, will be due on or before December 15, 2011.
3. Discovery regarding initial experts will commence on January 2, 2012 and continue until February 2, 2012.

4. Rebuttal expert reports, if any, will be due on or before March 15, 2012.
5. Discovery regarding rebuttal experts, if any, will commence on April 2, 2012 and continue until May 2, 2012.
6. The parties may extend the foregoing deadlines by mutual agreement provided such agreement is approved by the Bankruptcy Court upon a short pleading or letter setting forth the reasons for the proposed extension.
7. The Court will hold status conferences approximately every 60 days regarding this Adversary Proceeding, the first of which will be held on July 28, 2011 at 9:45 a.m.
8. Nothing herein shall be construed as prohibiting either party from seeking leave of court for an extension of any deadline established by this Order.
9. Nothing herein shall be construed as prohibiting either party from seeking a pre-motion conference pursuant to Local Rule 7056-1.
10. The Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

11. This Order is without prejudice to the rights of any party to request a status conference with the Court on no less than 10 days notice, unless exigent circumstances warrant otherwise.

Dated: May 23, 2011  
New York, New York

Dated: May 23, 2011  
New York, New York

**MCKOOL SMITH P.C.**

**CURTIS, MALLET-PREVOST,  
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By: /s/ Peter S. Goodman

By: /s/ Steven J. Reisman

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*Attorneys for the Liquidating Trustee*

DATED: May 24, 2011  
New York, New York

**SO ORDERED:**

*S/ Robert E. Gerber*  
ROBERT E. GERBER  
UNITED STATES BANKRUPTCY JUDGE